

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

Glen Dimplex Americas Ltd., f/k/a,
Dimplex North America Limited,

Plaintiff,

v.

Twin-Star International, Inc.,

Defendant.

Civil Action No. 2:18-cv-13504-
PB-MKM

Hon. Paul D. Borman
Magistrate Judge Elizabeth A.
Stafford

Joint Motion to Extend and Reset Claim Construction Deadlines

In accordance with Federal Rule of Civil Procedure 6(b)(1)(A), Twin-Star and Dimplex jointly submit this motion to extend and reset deadlines for claim construction set forth in the Court's Civil Case Management and Scheduling Order, ECF # 58.

Good cause for this motion exists for two reasons. First, as the parties exchanged disputed claims terms and constructions substantial disagreement regarding the claims-at-issue emerged. The parties require additional time to ensure the correct identification of claim terms-at-issue and, if possible, the resolution of those constructions without the Court's further involvement. Therefore, as a result of the agreement between the parties, the parties require

additional time to complete disputed claim term identification, proposed claim construction exchange, joint claim construction, and briefing on the same.

Second, the new deadlines identified below are required because counsel for Dimplex's upcoming wedding schedule.

Based on the foregoing reasons for good cause, the parties propose that the deadlines set forth in ECF #58 be extended and reset as follows:

EVENT	TIMELINE
Exchange of disputed claim terms	October 22, 2020
Exchange of proposed constructions	November 5, 2020
Joint claim constructions	November 12, 2020
Plaintiff's Opening Brief	December 11, 2020
Defendant's Responsive Brief	January 11, 2021
Plaintiff's Reply Brief	February 1, 2021

The Parties further note that because the remaining deadlines on the case calendar are dependent on the completion of claim construction, no other dates will need to be reset at this time. Therefore, for good cause shown, the Court should extend and reset the deadlines for claim construction as set forth above.

Dated: October 8, 2020

Respectfully submitted,

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